

UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

T-MOBILE WEST LLC AND
INDEPENDENT TOWERS HOLDINGS,
LLC,

Plaintiffs,

vs.

THE CITY OF MEDINA,
WASHINGTON,

Defendant.

CIVIL ACTION NO. 2:14-cv-
01455-RSL

DECLARATION OF KARI L.
SAND IN SUPPORT OF
PLAINTIFFS' AND
DEFENDANT'S JOINT MOTION
FOR ENTRY OF STIPULATED
JUDGMENT

Kari L. Sand declares and states:

1. I am the City Attorney for the City of Medina and counsel of record in this matter. I am over the age of 18 years, competent to testify herein, and make this declaration on personal knowledge of the facts stated.

2. Attached hereto as Exhibit A is a true and correct copy of the report of Stephen S. Lockwood, P.E., dated May 8, 2015.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.


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DECLARATION OF KARI L. SAND IN SUPPORT OF
PLAINTIFFS' AND DEFENDANT'S JOINT MOTION
FOR ENTRY OF STIPULATED JUDGMENT - 1
CIVIL ACTION NO. 2:14-cv-01455-RSL



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1 DATED this ^{13th}~~12th~~ day of May, 2015, at Issaquah, Washington.

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DECLARATION OF KARI L. SAND IN SUPPORT OF
PLAINTIFFS' AND DEFENDANT'S JOINT MOTION
FOR ENTRY OF STIPULATED JUDGMENT - 2
CIVIL ACTION NO. 2:14-cv-01455-RSL

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8 May 2015

Robert Grumbach, AICP
Director of Development Services
Medina City Hall
501 Evergreen Point Road
Medina, WA 98039

RE: T-Mobile West LLC V. City of Medina, WA

Dear Mr. Grumbach;

We have reviewed the Expert Report of Richard Conroy dated 6 May 2015. This report makes the case for gaps in coverage in the T-Mobile system in the Medina area. It documents these gaps in coverage by providing the results of drive tests and also demonstrates that an 80-foot tower (antenna center of 75 feet) is an acceptable solution to these coverage deficiencies. We find the discussion internally consistent and reasonable.

The Report supports the case for this proposed facility and is not inconsistent with our expectations based on our knowledge of the terrain surrounding the site, and typical wireless system architecture. We believe that an antenna height of 75' feet (80-foot tower) would not be an unreasonable height given the demonstrated needs of T-Mobile.

Sincerely,

Stephen S. Lockwood, P.E.

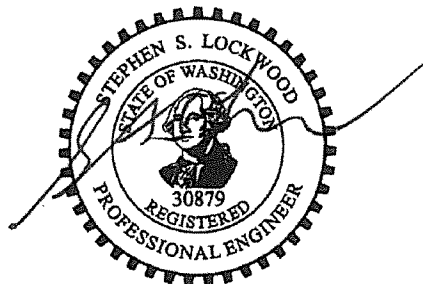


EXHIBIT A